

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re: Hypervibe, Inc.,

Debtor.

Case No. 20-27367-GMH
Chapter 7

TRUSTEE'S MOTION FOR THE ENTRY OF AN ORDER
AUTHORIZING THE TRUSTEE TO INCUR AN ADMINISTRATIVE
EXPENSE CLAIM FOR TRUSTEE ADMINISTRATIVE SERVICES

Bruce A. Lanser, the trustee in this case, moves the Court pursuant to Local Rule 2070.1, for the entry of an Order authorizing the trustee to incur an administrative expense claim for trustee administrative services as follows:

1. On November 10, 2020, an Order for Relief under Chapter 7 of the United States Bankruptcy Code was entered in this case. Bruce A. Lanser is the acting and qualified trustee in this case.
2. The bar date for creditors to file claims expired on February 23, 2021. Approximately 4,700 claims have been filed to date. The bankruptcy schedules listed approximately 9,000 creditors.
3. In order for the trustee to review and to assess the appropriateness of the filed claims, the claims must be

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electronically imported into the trustee's software system and then edited to ensure that the claims, as imported, match the claims themselves. Additionally, it will be necessary to import all of the scheduled claims and match them against the filed claims. The sheer magnitude of what is involved in importing and managing the claims, both filed and scheduled, necessitates the trustee hiring an outside trustee administration service to assist him.

4. Subject to the approval of the Bankruptcy Court, the trustee intends to enter into a services agreement with Bankruptcy Management Solutions, Inc., d/b/a Stretto ("Stretto") to assist the trustee with the claims management, including importing filed claims into the trustee's software system, ensuring that the name, address, amount and priority are accurate, that amended and duplicate claims and changes of address are accounted for, importing scheduled claims and matching them up with filed claims as appropriate, creating claims for scheduled claimants who did not file claims, and for such other services as Stretto and the trustee shall deem necessary and appropriate.

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5. For such claims management services, Stretto shall be compensated at the rate of \$50 per hour, with the cost of such services not to exceed \$5,000, even if the number of hours spent would otherwise exceed that amount.

6. The foregoing cost exceeds the \$2,500 aggregate limit for administrative expenses set by Local Rule 2070.1.

7. Stretto already provides the trustee with bankruptcy management software and support, the computer hardware used by the trustee, and Stretto and the trustee already have a working relationship. Accordingly, Stretto is well suited for the services to be provided to the trustee.

WHEREFORE, the trustee respectfully requests that the Court enter an order authorizing the trustee to engage the services of Stretto as outlined herein, with the cost of such services not to exceed \$5,000.

Dated this 10th day of March, 2021.

BRUCE A. LANSER, TRUSTEE



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